

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

INTERNATIONAL UNION OF OPERATING :  
ENGINEERS LOCAL 30 BENEFITS FUND, on :  
behalf of itself and all others similarly situated :

v. :

CIVIL ACTION NO. 16-990

LANNETT COMPANY, INC., IMPAX :  
LABORATORIES, INC., WEST-WARD :  
PHARMACEUTICALS CORPORATION, :  
ALLERGAN PLC, MYLAN :  
PHARMACEUTICALS, INC., and PAR :  
PHARMACEUTICALS COMPANIES, INC. :

NECA-IBEW WELFARE TRUST FUND, :  
individually and on behalf of all others :  
similarly situated :

v. :

CIVIL ACTION NO. 16-1371

ALLERGAN PLC, LANNETT COMPANY, :  
INC., PAR PHARMACEUTICAL :  
COMPANIES, INC., IMPAX :  
LABORATORIES, MYLAN, INC., and :  
WEST-WARD PHARMACEUTICALS CORP. :

TULSA FIREFIGHTERS HEALTH AND :  
WELFARE TRUST, on behalf of itself and all :  
others similarly situated :

v. :

CIVIL ACTION NO. 16-1388

ALLERGAN PLC, IMPAX LABORATORIES, :  
INC., THE LANNETT COMPANY, INC., :  
MYLAN INC., PAR PHARMACEUTICALS, :  
INC., SUN PHARMACEUTICAL INDUSTRIES :  
CO., and WEST-WARD PHARMACEUTICAL :  
CORP. :

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**TWIN CITIES PIPE TRADES WELFARE  
FUND, individually and on behalf of all others  
similarly situated**

**v.**

**CIVIL ACTION NO. 16-1534**

**LANNETT COMPANY, INC., IMPAX  
LABORATORIES, INC., WEST-WARD  
PHARMACEUTICALS CORPORATION,  
ALLERGAN PLC; MYLAN  
PHARMACEUTICALS, INC., and PAR  
PHARMACEUTICAL COMPANIES, INC.**

**EDWARD CARPINELLI, on behalf of himself  
and all others similarly situated**

**v.**

**CIVIL ACTION NO. 16-1954**

**LANNETT COMPANY, INC., IMPAX  
LABORATORIES, INC., WEST-WARD  
PHARMACEUTICALS CORPORATION,  
ALLERGAN PLC; MYLAN  
PHARMACEUTICALS, INC., and PAR  
PHARMACEUTICAL COMPANIES, INC.**

**FRATERNAL ORDER OF POLICE, MIAMI  
LODGE 20, INSURANCE TRUST FUND,  
individually and on behalf of all others  
similarly situated**

**v.**

**CIVIL ACTION NO. 16-2031**

**LANNETT COMPANY, INC., ALLERGAN  
PLC, IMPAX LABORATORIES, MYLAN,  
INC., PAR PHARMACEUTICAL  
COMPANIES, INC., SUN  
PHARMACEUTICAL INDUSTRIES CO., and  
WEST-WARD PHARMACEUTICAL CORP.**

**NINA DIAMOND, on behalf of herself  
and all others similarly situated**

**v.**

**CIVIL ACTION NO. 16-2077**

**LANNETT COMPANY, INC., IMPAX  
LABORATORIES, INC., WEST-WARD  
PHARMACEUTICALS CORPORATION,  
ALLERGAN PLC; MYLAN  
PHARMACEUTICALS, INC., and PAR  
PHARMACEUTICAL COMPANIES, INC.**

**UFCW LOCAL 1500 WELFARE FUND, on  
behalf of itself and all others similarly situated**

**v.**

**CIVIL ACTION NO. 16-2169**

**ALLERGAN PLC, IMPAX LABORATORIES,  
INC., LANNETT COMPANY, INC., MYLAN  
INC., MYLAN PHARMACEUTICALS, INC.,  
PAR PHARMACEUTICAL, INC., PAR  
PHARMACEUTICAL COMPANIES, INC.,  
SUN PHARMACEUTICAL INDUSTRIES  
LTD., SUN PHARMACEUTICAL  
INDUSTRIES, INC., and WEST-WARD  
PHARMACEUTICALS CORP.**

**MINNESOTA LABORERS HEALTH &  
WELFARE FUND, individually and on behalf  
of all others similarly situated**

**v.**

**CIVIL ACTION NO. 16-2191**

**LANNETT COMPANY, INC., IMPAX  
LABORATORIES, INC., WEST-WARD  
PHARMACEUTICALS CORPORATION,  
ALLERGAN PLC; MYLAN  
PHARMACEUTICALS, INC., and PAR  
PHARMACEUTICAL COMPANIES, INC.**

**PHILADELPHIA FEDERATION OF  
TEACHERS HEALTH & WELFARE FUND,  
individually and on behalf of all others  
similarly situated**

**v.**

**CIVIL ACTION NO. 16-2468**

**LANNETT COMPANY, INC., IMPAX  
LABORATORIES, INC., WEST-WARD  
PHARMACEUTICALS CORPORATION,  
ALLERGAN PLC; MYLAN  
PHARMACEUTICALS, INC., and PAR  
PHARMACEUTICAL COMPANIES, INC.**

**UNITED FOOD & COMMERCIAL WORKERS:  
AND EMPLOYERS ARIZONA HEALTH &  
WELFARE TRUST, individually and on behalf  
of all others similarly situated**

**v.**

**CIVIL ACTION NO. 16-2810**

**ALLERGAN PLC; ACTAVIS PLC, IMPAX  
LABORATORIES, INC., LANNETT  
COMPANY, INC., MYLAN  
PHARMACEUTICALS, INC., PAR  
PHARMACEUTICALS CORPORATION, and  
WEST-WARD PHARMACEUTICAL  
COMPANIES, INC.**

**OTIS MCCRARY, on behalf of himself  
and all others similarly situated**

**v.**

**CIVIL ACTION NO. 16-3091**

**LANNETT COMPANY, INC., IMPAX  
LABORATORIES, INC., WEST-WARD  
PHARMACEUTICALS CORPORATION,  
ACTAVIS, PLC, MYLAN  
PHARMACEUTICALS, INC., ENDO  
INTERNATIONAL PLC, SUN  
PHARMACEUTICAL INDUSTRIES, INC.,  
and PAR PHARMACEUTICAL  
COMPANIES, INC.**

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**PLUMBERS & PIPEFITTERS LOCAL 33  
HEALTH & WELFARE FUND, individually  
and on behalf of all others similarly situated**

**v.**

**CIVIL ACTION NO. 16-3576**

**ALLERGAN PLC, ACTAVIS PLC, IMPAX  
LABORATORIES, INC., LANNETT, INC.,  
MYLAN PHARMACEUTICALS, INC., PAR  
PHARMACEUTICAL COMPANIES, INC.,  
and WEST-WARD PHARMACEUTICALS  
CORP.**

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**PLUMBERS & PIPEFITTERS LOCAL 178  
HEALTH & WELFARE TRUST FUND, on  
on behalf of itself and all others similarly situated:**

**v.**

**CIVIL ACTION NO. 16-3635**

**LANNETT COMPANY, INC., IMPAX  
LABORATORIES, INC., WEST-WARD  
PHARMACEUTICALS CORPORATION,  
ACTAVIS PLC, MYLAN  
PHARMACEUTICALS, INC., ENDO  
INTERNATIONAL PLC, SUN  
PHARMACEUTICAL INDUSTRIES, INC.,  
and PAR PHARMACEUTICAL  
COMPANIES, INC.,**

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**ORDER**

**AND NOW**, this 14th day of July 2016, upon consideration of the attached stipulation among Plaintiffs International Union of Operating Engineers Local 30 Benefits Fund, NECA-IBEW Welfare Trust Fund, Tulsa Firefighters Health and Welfare Trust, Twin Cities Pipe Trades Welfare Fund, Fraternal Order of Police, Miami Lodge 20, Insurance Fund, Edward Carpinelli, Nina Diamond, UFCW Local 1500 Welfare Fund, Minnesota Laborers Health and Welfare Fund, the Philadelphia Federation of Teachers Health & Welfare Fund, the United Food &

Commercial Workers and Employers Arizona Health & Welfare Trust, Otis McCrary, Plumbers & Pipefitters Local 33 Health and Welfare Fund, and Plumbers & Pipefitters Local 178 Health & Welfare Trust Fund (“End-Payer Plaintiffs” or “Indirect Purchaser Plaintiffs”) and Defendants Lannett Company, Inc., Impax Laboratories, Inc., West-Ward Pharmaceuticals Corporation, Allergan plc, Mylan, Inc., Mylan Pharmaceuticals, Inc., Actavis plc, and Par Pharmaceutical Companies, Inc. (“Defendants”)<sup>1</sup>, it is hereby **ORDERED** that the stipulation is **APPROVED in part** as set forth below.

Subject to further order of this Court or any transferee Court, it is hereby **ORDERED** that:

1. Defendants’ time to answer, move or otherwise respond to Plaintiffs’ complaints shall be extended until after disposition of the proceeding before the Judicial Panel on Multidistrict Litigation (“JPML”) with regard to the motion filed before the JPML to transfer and consolidate or coordinate the related actions in this case (JPML No. 2724) as follows:

a. If the JPML transfers all the Related Actions to a single district for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407, Defendants shall, as permitted by Federal Rule of Civil Procedure 12, answer, move or otherwise plead in response to the complaint within 60 days after either: (i) the plaintiffs in the consolidated or coordinated actions serve a Consolidated Class Action Complaint, or (ii) the plaintiffs in the consolidated or coordinated actions serve written notice that they will not file a Consolidated Class Action Complaint.

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<sup>1</sup> The Court notes that the Sun Pharmaceutical Defendants and Endo International plc, named in one or more of the above-captioned complaints, are not presently parties to the stipulation. This Order applies to all Defendants except with regard to acceptance of service of process; in the absence of agreement of counsel, service of process shall be effected pursuant to Federal Rule of Civil Procedure 4.



b. If the JPML denies the motions to transfer these cases and all related civil actions to a single district for coordinated or consolidated pretrial proceedings, Defendants shall, as permitted by Federal Rule of Civil Procedure 12, answer, move or otherwise plead in response to End-Payer Plaintiffs' complaints within 60 days of the later of (i) service of the JPML ruling; or (ii) service of a Consolidated Class Action Complaint.

2. Plaintiffs shall have 60 days from the filing and service of any motions to dismiss to file and serve any memoranda in opposition thereto. Any reply memoranda shall be filed 45 days after service and filing of any opposition memoranda. If a filing deadline falls on a weekend or federal holiday, the memorandum shall be filed on the first business day following such weekend or holiday. No extension among all End-Payer Plaintiffs and Defendants has been previously requested of or granted by the Court, and the Court as yet has issued no rulings with regard to the ability of any Defendant to move to sever parties, claims, or allegations in response to any Consolidated Class Action Complaint or at any time during the litigation.

3. Before the filing of any motion to dismiss by Defendants, interim class counsel and Defendants shall meet and confer regarding appropriate page limitations for memoranda in support of and in opposition to such motions, and for any replies, and submit to the Court a proposed order and stipulation regarding page limitations, or if the Parties cannot agree on page limitations, a proposed order identifying the differing proposals and a brief explanation by Plaintiffs and Defendants, as a group, of the reasons therefor. Defendants shall make good-faith efforts to coordinate and consolidate common legal arguments, but may file individual briefs to allow for Defendant-specific arguments.

4. Defendants have agreed to accept service of the Summons and Complaints via email from Plaintiffs' counsel to counsel for Defendants,<sup>2</sup> or, for Complaints already served, have stipulated that Process and Service of Process was proper under Federal Rule of Civil Procedure 4. Except as to sufficiency of process and service of process, Defendants have not waived any other basis for moving to dismiss any action, including lack of personal jurisdiction.

It is so **ORDERED**.

BY THE COURT:

  
CYNTHIA M. RUFÉ, J.

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<sup>2</sup> Pursuant to the stipulation, counsel for Allergan plc have agreed to accept service of summons and the complaints on behalf of Actavis, Inc. for any of the above-captioned actions (including those that have named that have named Actavis, Inc. or Actavis plc) and the Consolidated Class Action Complaint that may be filed in a consolidated, coordinated action. Plaintiffs have agreed to substitute Actavis, Inc. in any Consolidated Class Action Complaint or, in the event a Consolidated Class Action Complaint is not filed, in the individual complaints in the above-captioned cases (to the extent such complaints remain operative).



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**FAX**

**Date:** July 7, 2016  
**From:** Jeannine Kenney  
**To:** Chambers of the Honorable Cynthia M. Rufe  
**Company:** United States District Court for the Eastern District of  
Pennsylvania  
**Fax Number:** (267) 299-5077  
**Number of Pages: 26**  
**(Including cover sheet)**  
**RE:** *In re Generic Drug Pricing Antitrust Litigation*, MDL No. 2724, and related  
actions

If you experience any problems with the receipt of this fax, please contact **Jeannine Kenney** at (202) 540-7233.

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

INTERNATIONAL UNION OF  
OPERATING ENGINEERS LOCAL 30  
BENEFITS FUND, on behalf of itself and all  
others similarly situated,

Plaintiff,

v.

LANNETT COMPANY, INC., IMPAX  
LABORATORIES, INC., WEST-WARD  
PHARMACEUTICALS CORPORATION,  
ALLERGAN PLC, MYLAN  
PHARMACEUTICALS, INC., and PAR  
PHARMACEUTICAL COMPANIES, INC.

Defendants.

Civil Action No. 2:16-cv-00990-CMR

NECA-IBEW WELFARE TRUST FUND,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

ALLERGAN PLC, LANNETT COMPANY,  
INC., PAR PHARMACEUTICAL  
COMPANIES, INC., IMPAX  
LABORATORIES, MYLAN INC. and  
WEST-WARD PHARMACEUTICAL  
CORP.

Defendants.

Civil Action No. 2:16-cv-01371-CMR

TULSA FIREFIGHTERS HEALTH AND  
WELFARE TRUST, on behalf of itself and  
all others similarly situated,

Plaintiff,

v.

ALLERGAN PLC, IMPAX  
LABORATORIES, INC., THE LANNETT  
COMPANY, INC., MYLAN INC., PAR  
PHARMACEUTICALS, INC., SUN  
PHARMACEUTICAL INDUSTRIES CO.,  
and WEST-WARD PHARMACEUTICAL  
CORP.

Defendants.

Civil Action No. 2:16-cv-01388-CMR

TWIN CITIES PIPE TRADES WELFARE  
FUND, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

LANNETT COMPANY, INC., IMPAX  
LABORATORIES, INC., WEST-WARD  
PHARMACEUTICALS CORPORATION,  
ALLERGAN PLC; MYLAN  
PHARMACEUTICALS, INC., AND PAR  
PHARMACEUTICAL COMPANIES, INC.

Defendants.

Civil Action No. 2:16-cv-01534-CMR

EDWARD CARPINELLI, on behalf of  
himself and all Others similarly situated,

Plaintiffs,

v.

LANNETT COMPANY, INC.; IMPAX  
LABORATORIES, INC.; WEST-WARD  
PHARMACEUTICALS CORPORATION;  
ALLERGAN PLC; MYLAN  
PHARMACEUTICALS, INC.; AND PAR  
PHARMACEUTICAL COMPANIES, INC.,

Defendants.

Civil Action No. 2:16-cv-1954-CMR

FRATERNAL ORDER OF POLICE,  
MIAMI LODGE 20, INSURANCE TRUST  
FUND, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

ALLERGAN PLC, LANNETT COMPANY,  
INC., PAR PHARMACEUTICAL  
COMPANIES, INC., IMPAX  
LABORATORIES, MYLAN INC., SUN  
PHARMACEUTICAL INDUSTRIES CO.,  
and WEST-WARD PHARMACEUTICAL  
CORP.,

Defendants.

Civil Action No. 2:16-cv-2031-CMR

<p>NINA DIAMOND, on behalf of herself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>LANNETT COMPANY, INC., IMPAX LABORATORIES, INC., WEST-WARD PHARMACEUTICALS CORPORATION, ALLERGAN PLC, MYLAN PHARMACEUTICALS, INC. AND PAR PHARMACEUTICAL COMPANIES, INC.,</p> <p>Defendants.</p>	<p>Civil Action No. 2:16-cv-02077-CMR</p>
<p>UFCW LOCAL 1500 WELFARE FUND, on behalf of itself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>ALLERGAN PLC, IMPAX LABORATORIES, INC., LANNETT COMPANY, INC., MYLAN INC., MYLAN PHARMACEUTICALS INC., PAR PHARMACEUTICAL, INC., PAR PHARMACEUTICAL COMPANIES, INC., SUN PHARMACEUTICAL INDUSTRIES LTD., SUN PHARMACEUTICAL INDUSTRIES, INC. and WEST-WARD PHARMACEUTICALS CORP.,</p> <p>Defendants.</p>	<p>Civil Action No. 2:16-cv-02169-CMR</p>

<p>MINNESOTA LABORERS HEALTH &amp; WELFARE FUND, individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>LANNETT COMPANY, INC., IMPAX LABORATORIES, INC., WEST-WARD PHARMACEUTICALS CORPORATION, ALLERGAN PLC, MYLAN PHARMACEUTICALS, INC., AND PAR PHARMACEUTICAL COMPANIES, INC.</p> <p>Defendants.</p>	<p>Civil Action No. 2:16-cv-2191-CMR</p>
<p>PHILADELPHIA FEDERATION OF TEACHERS HEALTH &amp; WELFARE FUND, individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>LANNETT COMPANY, INC., IMPAX LABORATORIES, INC., WEST-WARD PHARMACEUTICALS CORPORATION, ALLERGAN PLC, MYLAN PHARMACEUTICALS, INC., AND PAR PHARMACEUTICAL COMPANIES, INC.</p> <p>Defendants.</p>	<p>Civil Action No. 2:16-cv-02468-CMR</p>



<p>UNITED FOOD &amp; COMMERCIAL WORKERS AND EMPLOYERS ARIZONA HEALTH &amp; WELFARE TRUST, individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>LANNETT COMPANY, INC., IMPAX LABORATORIES, INC., WEST-WARD PHARMACEUTICALS CORPORATION, ALLERGAN PLC; MYLAN PHARMACEUTICALS, INC., PAR PHARMACEUTICAL COMPANIES, INC., AND ACTAVIS PLC.</p> <p>Defendants.</p>	<p>Civil Action No. 2:16-cv-02810-CMR</p>
<p>OTIS MCCRARY, on behalf of himself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>LANNETT COMPANY, INC., IMPAX LABORATORIES, INC., WEST-WARD PHARMACEUTICALS CORPORATION, ACTAVIS PLC, MYLAN PHARMACEUTICALS, INC., ENDO INTERNATIONAL PLC, SUN PHARMACEUTICAL INDUSTRIES, INC AND PAR PHARMACEUTICAL COMPANIES, INC.,</p> <p>Defendants.</p>	<p>Civil Action No. 2:16-cv-03091-CMR</p>

<p>PLUMBERS &amp; PIPEFITTERS LOCAL 33 HEALTH AND WELFARE FUND, on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>ALLERGAN PLC; ACTAVIS PLC; IMPAX LABORATORIES, INC.; LANNETT, INC; MYLAN PHARMACEUTICALS, INC.; PAR PHARMACEUTICAL COMPANIES, INC.; and WEST-WARD PHARMACEUTICALS CORP.,</p> <p>Defendants.</p>	<p>Civil Action No. 2:16-cv-03576-CMR</p>
<p>PLUMBERS &amp; PIPEFITTERS LOCAL 178 HEALTH &amp; WELFARE TRUST FUND, on behalf of itself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>LANNETT COMPANY, INC; IMPAX LABORATORIES, INC.; WEST-WARD PHARMACEUTICALS CORPORATION; ACTAVIS PLC; MYLAN PHARMACEUTICALS, INC.; ENDO INTERNATIONAL PLC; SUN PHARMACEUTICAL INDUSTRIES, INC.; and PAR PHARMACEUTICAL COMPANIES, INC.,</p> <p>Defendants.</p>	<p>Civil Action No. 2:16-cv-03635-CMR</p>

**JOINT STIPULATION AND [PROPOSED ORDER] TO SET DEADLINES FOR  
RESPONSIVE PLEADINGS**

WHEREAS, Plaintiffs International Union of Operating Engineers Local 30 Benefits Fund, NECA-IBEW Welfare Trust Fund, Tulsa Firefighters Health and Welfare Trust, Twin Cities Pipe Trades Welfare Fund, Fraternal Order of Police, Miami Lodge 20, Insurance Fund, Edward Carpinelli, Nina Diamond, UFCW Local 1500 Welfare Fund, Minnesota Laborers Health and Welfare Fund, the Philadelphia Federation of Teachers Health & Welfare Fund, the United Food & Commercial Workers and Employers Arizona Health & Welfare Trust (“Plaintiffs”), Otis McCrary, Plumbers & Pipefitters Local 33 Health and Welfare Fund, and Plumbers & Pipefitters Local 178 Health & Welfare Trust Fund have each filed putative class action complaints in this District against Defendants Lannett Company, Inc., Impax Laboratories, Inc., West-Ward Pharmaceuticals Corporation, Allergan plc, Mylan, Inc., Mylan Pharmaceuticals, Inc., Actavis plc, and Par Pharmaceutical Companies, Inc. (“Defendants”).<sup>1</sup>

WHEREAS, Plaintiffs and Defendants agree that judicial efficiency is best served by coordinating Plaintiffs’ actions—and any similar actions—to the extent practicable;

WHEREAS, on May 12, 2016, Plaintiff The City of Providence filed a similar putative class action complaint in the United States District Court for the District of Rhode Island (Case No. 1:16-cv-00214) (together with the above-captioned actions the “Related Actions”);

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<sup>1</sup> This stipulation does not purport to limit or otherwise diminish the rights of the Sun Pharmaceutical Defendants and Endo International plc, named in one or more of the above captioned Complaints, which are not presently parties to this stipulation.

WHEREAS, on May 19, 2016, a motion was filed with the Judicial Panel on Multidistrict Litigation ("JPML") to Transfer and Consolidate or Coordinate the Related Actions in this Court (the "Motion");

WHEREAS, responses to the Motion were filed on June 13, 2016, and the JPML has set the Motion for hearing on July 28, 2016;

WHEREAS, to economize both judicial and Party resources pending the JPML's decision on the Motion, the Parties believe and agree that Defendants' time to move to dismiss, answer, or otherwise respond to Plaintiffs' complaints should be extended until after the JPML has ruled on the pending Motion, it has been determined which court will preside over the Related Actions, and any consolidated amended complaint has been filed;

NOW, THEREFORE, pursuant to Local Rule 7.4, the parties hereby stipulate, and the Court orders, as follows:

1. Defendants' time to answer, move or otherwise respond to Plaintiffs' complaints shall be extended until after disposition of the JPML proceeding, as provided below:
  - a. If the JPML transfers all the Related Actions to a single district for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407, Defendants shall, as permitted by Federal Rule 12, answer, move or otherwise plead in response to the complaint within 60 days after either: (i) the plaintiffs in the consolidated or coordinated actions serve a Consolidated Class Action Complaint, or (ii) the plaintiffs in the consolidated or coordinated actions serve written notice that they will not file a consolidated amended complaint.
  - b. If the JPML denies the motions to transfer these cases and all related civil actions to a single district for coordinated or consolidated pretrial proceedings,

Defendants shall, as permitted by Federal Rule 12, answer, move or otherwise plead in response to Plaintiffs' complaint within 60 days of the later of (i) service of the JPML ruling; or (ii) service of a Consolidated Class Action Complaint.

2. Plaintiffs shall have 60 days from the filing and service of any motions to dismiss to file and serve any memoranda in opposition thereto. Any reply memoranda shall be filed 45 days after service and filing of any opposition memoranda. If a filing deadline falls on a weekend or federal holiday, the memorandum shall be filed on the first business day following such weekend or holiday. No extension among all Plaintiffs and Defendants has been previously requested or granted by the Court. For the avoidance of doubt, this stipulation supersedes all previous stipulations in any of the above-captioned matters. Defendants reserve the right to file a motion to sever parties, claims, or allegations in response to the Consolidated Class Action Complaint or at any time during the litigation.

3. Prior to the filing of any motion to dismiss by Defendants, interim class counsel and Defendants shall meet and confer regarding appropriate page limitations for memoranda in support of and in opposition to such motions, and for any replies, and submit to the Court a proposed order and stipulation regarding page limitations, or if the Parties cannot agree on page limitations, a proposed order identifying the differing proposals and a brief explanation by Plaintiffs and Defendants, as a group, of the reasons therefor. Defendants will make good faith efforts to coordinate and consolidate common legal arguments, but reserve the right to file individual briefs to allow for Defendant specific arguments.

4. Defendants agree to accept service of the Summons and Complaints via email from Plaintiffs' counsel to the undersigned counsel for Defendants,<sup>2</sup> or, for Complaints already served, stipulate that Process and Service of Process was proper under Rule 4 of the Federal Rules of Civil Procedure. Except as to sufficiency of process and service of process, Defendants expressly reserve the right to challenge the complaints and any Consolidated Class Action Complaint, on any and all grounds, including personal jurisdiction.

5. In the event that additional class action complaints alleging similar conduct against Defendants are filed in this District by other end payers of doxycycline or digoxin, such Actions shall be bound by this Order.

6. In the event that additional complaints alleging similar conduct against Defendants are filed in any other jurisdiction, Defendants shall promptly notify Plaintiffs of any such filings, and shall promptly notify Plaintiffs of service of any discovery in such cases.

**IT IS SO STIPULATED AND ORDERED.**

Dated: July 7, 2016

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<sup>2</sup> Counsel for Allergan plc agree to accept service of summons and the complaints on behalf of Actavis, Inc. for any of the above-captioned actions (including those that have named that have named Actavis, Inc. or Actavis plc) and the Consolidated Class Action Complaint that may be filed in a consolidated, coordinated action. Plaintiffs have agreed to substitute Actavis, Inc. in any Consolidated Class Action Complaint or, in the event a Consolidated Class Action Complaint is not filed, in the individual complaints in the above-captioned matters (to the extent such complaints remain operative).



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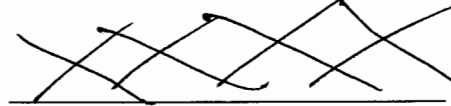
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